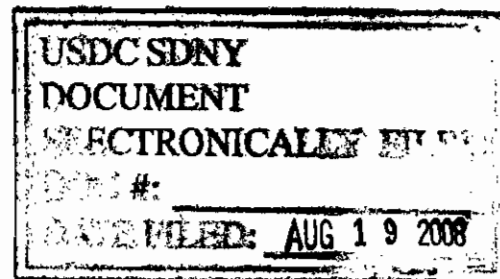


*Swain, J*

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK



\_\_\_\_\_  
In re FOCUS MEDIA HOLDING  
LIMITED LITIGATION

This Document Relates To:  
All Actions

\_\_\_\_\_  
: MASTER FILE  
: 07 Civ. 10617 (LTS)(GWG)  
:

: STIPULATION AND  
: (PROPOSED) ORDER EXTENDING  
: TIME TO RESPOND TO COMPLAINT  
:  
: \_\_\_\_\_  
: X

WHEREAS, on February 26, 2008, the Court approved a stipulation between Plaintiffs and Defendants, establishing a schedule for filing papers in response to the complaint in the above-captioned case;

WHEREAS the stipulation approved of on February 26, 2008 has been the only previous request for an adjournment or extension for filing papers in response to the complaint in the above-captioned case;

WHEREAS, on June 23, 2008, Lead Plaintiff Iron Workers Local No. 25 Pension Fund filed a Consolidated Amended Complaint in the above-captioned case;

WHEREAS, Lead Plaintiff and Defendants have conferred and agreed, subject to the Court's approval, to amend the schedule for the filing of the Defendants' papers responding to the Consolidated Amended Complaint (from its original date of August 22, 2008) and any oppositions and replies thereto;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties as follows:

1. The time for all Defendants to respond or move against the Consolidated Amended Complaint in the above-captioned action is extended until September 5, 2008.
2. If any or all of Defendants move to dismiss the Consolidated Amended Complaint, lead plaintiff will file within sixty (60) days papers opposing such motion(s). Defendants will then have thirty (30) days to reply to such opposition(s).

Dated: New York, New York  
August 15, 2008

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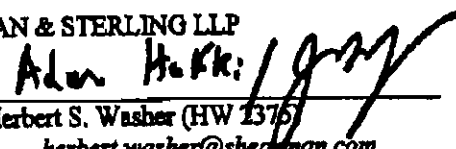
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*Attorneys for Citigroup Global Markets,  
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and Merrill Lynch & Co., Inc.*

IT IS SO ORDERED:

DATED:

Aug 19 2008

  
THE HONORABLE LAURA T. SWAIN  
UNITED STATES DISTRICT JUDGE